

**UNITED STATES DISTRICT COURT**  
for the  
Eastern District of Michigan

United States of America

v.

Shariq Alam

Case No.25-mj-30093

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 1, 2023 to February 25, 2025 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*

*Offense Description*

18 U.S.C. § 2251(a), (e) & (2)  
18 U.S.C. § 2252A(a)(5)

Sexual exploitation of a minor; conspiracy and aiding and abetting.  
Possession of child pornography.

This criminal complaint is based on these facts:  
see attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: February 27, 2025

City and state: Detroit, Michigan



*Complainant's signature*

Michael Hendricks, Special Agent (HSI)

*Printed name and title*



*Judge's signature*

Hon. Anthony P. Patti, United States Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR  
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Michael Hendricks, being first duly sworn, state as follows:

1. I am a Special Agent with Homeland Security Investigations (HSI), of the United States Department of Homeland Security (DHS). I have been employed as a Special Agent for HSI since January 2020. I successfully completed the criminal Investigator Training Program (CITP) (2015) and the HSI Special Agent training (HSISAT) (2021) at the Federal Law enforcement training center (FLETC) in Glynco, GA. Prior to joining HSI, I completed the U.S. Secret Service Special Agent Training (SABT) in Beltsville, MD (2015). I also completed the Health and Human Services Office of Inspector General (HHS-OIG) Special Agent Training Program (SABT) in Largo, MD (2016). I received a bachelor's degree in public safety studies from Sienna Heights University and a master's degree in public administration from the University of Michigan. Additionally, I am a Computer Forensic Agent (CFA). I have successfully completed the Basic Computer Evidence Recovery Training (BCERT) and Basic Mobile Device Forensic Training (BMDF) at the IRS-CI Digital forensics lab in Woodbridge, VA. While employed at HSI, I have investigated Federal criminal violations related to cybercrime, child exploitation, and child pornography. I have received training on child pornography and child exploitation and have had the opportunity to observe

and review numerous examples of child pornography (as defined in U.S.C. 18 § 2256) in all forms of media.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for Shariq ALAM for violations of 18 U.S.C. § 2251(a), (e) & (2) (sexual exploitation of a minor, and conspiracy and aiding and abetting); and 18 U.S.C. § 2252A(a)(5) (possession of child pornography).

3. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information made available to me by other law enforcement professionals. These facts are provided for the sole purpose of establishing probable cause for the issuance of a criminal complaint and arrest warrant; therefore, this affidavit does not necessarily contain all information uncovered during this investigation. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause for an arrest warrant for Shariq ALAM.

4. In February 2025, HSI SA Michael Hendricks received information from a local police department in the Eastern District of Michigan that an individual suspected to be Shariq ALAM had sent electronic communications to

another Individual-1, whose identity is known to law enforcement, during approximately July 2023-November 2024. On one occasion, Individual-1 asked ALAM whether ALAM could bring a minor to meet with Individual-1. In response, ALAM asked for a ride and stated that he wanted the minor to be “slammed.” On another occasion, ALAM stated that he had taken a “fucking hot ass video” of a minor that he was next to. On another occasion, ALAM stated that he was next to a minor who was “looking juicy,” and Individual-1 responded, “ur torturing me”. ALAM also stated to Individual-1, “Find a way to put him to sleep and then no limits.” Individual-1 stated that he had “g”, and ALAM asked, “how much should knock him out?” Based on law enforcement training information, “g” is one of the terms used to refer to GHB, a depressant drug with sedative and euphoric effects.

5. In these communications, ALAM provided his residential street address within the Eastern District of Michigan, which was the same address as ALAM’s address on record with the Michigan Secretary of State. Law enforcement also searched for the telephone numbers associated with these electronic communications in databases available to law enforcement, and the results showed that the telephone numbers were associated with ALAM.

6. On February 25, 2025, law enforcement obtained state search warrants for ALAM’s residence in the Eastern District of Michigan and ALAM’s

electronic devices, which were executed on the same day. ALAM was present at the residence at the time of the search.

7. In a basement bedroom at the residence, law enforcement observed a cell phone holder, and an external camera light attached to the nightstand facing the bed. In the same room, law enforcement located sexual toys and paraphernalia and several flash drives.

8. In an initial preview of two of the flash drives, HSI Computer Forensic Agents observed multiple videos that meet the Federal definition of child pornography, including the following:

- a. A video labeled 'mov1.mp4' is approximately thirty-four seconds in length and has an associated creation date of January 1, 2023. The video depicts an apparent male minor child, based on his stature and appearance, laying on his side with his nude buttocks facing the camera. An adult male gets behind the minor child and appears to insert his penis into the minor's buttocks. The bed and background in the video appear to be the same as the aforementioned bedroom. Law enforcement also found a sleeping bag in the bedroom that matches a sleeping bag depicted in the video.
- b. A video labeled 'screen-20221223[redacted]'. This video is approximately one minute and twenty-eight seconds in length. This

video begins with an apparent adult male laying on his side next to a nude prepubescent male child. The video depicts the adult male repeatedly inserting his penis between or into the minor child's buttocks.

- c. A video labeled 'EF944710-1D7E-469A-AAEE-[redacted].mp4'.

This video is approximately six seconds in length and has an associated creation date of December 25, 2024. This video depicts a pre-pubescent male, laying on his side facing away from the camera. The camera pans to a nude adult male, with a similar body structure as ALAM. The nude male is masturbating next to the pre-pubescent male.

9. In the same folder on the flash drive, law enforcement also found videos showing ALAM and other adults engaging in sexual activity. In some of these videos, ALAM's face is also visible at the beginning of the video, in the manner of someone beginning a recording from a forward-facing cell phone camera. Some of these videos also appear to be filmed in the same basement bedroom searched by law enforcement.

10. Based on the information above, there is probable cause to believe that Shariq ALAM violated 18 U.S.C. § 2251(a), (e) & (2) (sexual exploitation of a minor, and conspiracy and aiding and abetting); and 18 U.S.C. § 2252A(a)(5) (possession of child pornography).

11. Wherefore by this affidavit and application, Affiant requests that the Court authorize the issuance of a criminal complaint and arrest warrant for Shariq ALAM.

Respectfully submitted,



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Michael Hendricks, Special Agent  
Department of Homeland Security  
Homeland Security Investigations

Sworn to before me in my presence and/or  
by reliable electronic means



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Hon. Anthony P. Patti  
United States Magistrate Judge

February 27, 2025